UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

OCT 0 6 2015

CERTIFIED MAIL 70091680000076487689
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Ms. Noreen Atkinson
Environmental and Safety Manager
Materion Advanced Chemicals Inc.
1316 St. Paul Avenue
Milwaukee, Wisconsin 53233

Re: Notice of Violation
Compliance Evaluation Inspection
WID006429005

Dear Ms. Atkinson:

On March 25, 2015, a representative of the U.S. Environmental Protection Agency inspected the Materion Advanced Chemicals Inc. facility located in Milwaukee, Wisconsin (Materion). As a large quantity generator of hazardous waste, Materion is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq*. (RCRA). The purpose of the inspection was to evaluate Materion's compliance with certain provisions of RCRA. A copy of the inspection report is enclosed for your reference.

Based on information provided by Materion, EPA's review of records pertaining to Materion, and the inspector's observations, EPA has determined that Materion has unlawfully stored hazardous waste without a license or interim status as a result of Materion's violation of certain requirements for a license exemption under Wis. Admin. Code § NR 662.034(1)-(3). EPA has identified the license exemption requirement(s) violated by Materion as of the date of the inspection in paragraphs 1-2, below.

Storage of Hazardous Waste without a License or Interim Status

At the time of the inspection, Materion violated the following large quantity generator license exemption requirements:

1. Date When Each Period of Accumulation Begins

Under Wis. Admin. Code § NR 662.034(1)(b) [40 C.F.R. § 262.34(a)(2)], a large quantity generator must clearly mark each container holding hazardous waste with the date upon which each period of accumulation begins.

At the time of the inspection, Materion maintained one 55-gallon drum of hazardous zinc arsenide waste mop water in the facility's 90-day storage area that was not marked with the date upon which accumulation of hazardous waste began.

2. Content of Contingency Plan

Under Wis. Admin. Code §§ NR 662.034(1)(d) and 665.0052(3) [40 C.F.R. §§ 262.34(a)(4) and 265.52(c)], a large quantity generator's contingency plan must include a description of the emergency arrangements made with the local emergency authorities

At the time of the inspection, Materion did not have a description of the emergency arrangements the facility has made with the local hospital and police department in the contingency plan.

Summary: By violating the requirements for a license exemption, above, Materion became an operator of a hazardous waste storage facility, and was required to obtain a Wisconsin hazardous waste storage license. Materion failed to apply for such a license. Materion's failure to apply for and obtain a hazardous waste storage license violated the requirements of Wis. Admin. Code §§ NR 680.30, 680.31, and 680.32 [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)].

At this time, EPA is not requiring Materion to apply for a Wisconsin hazardous waste storage permit so long as maintains compliance with the conditions for a permit exemption outlined in paragraphs 1-2, above.

During the inspection, as observed by EPA, and after the inspection, as documented in a April 17, 2015, email to EPA, you took certain actions to establish compliance with the above conditions. Based on the corrective action during the inspection and information received from Materion on April 17, 2015, EPA is not planning additional enforcement actions based on this inspection at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA appreciates Materion's cooperation

If you have any questions regarding this letter, please contact Mr. Samaranski, of my staff, at 312-886-7812 or at Samaranski.Derrick@epa.gov.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Dolores Hayden, WI DNR, Dolores.Hayden@wisconsin .gov
Michael Ellenbecker, WI DNR, Michael.Ellenbecker@wisconsin.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR-8J
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME:	Materion Advanced Chemicals Inc.
EPA ID No.:	WID006429005
ADDRESS:	1316 St. Paul Avenue Milwaukee, Wisconsin 53233
DATE OF INSPECTION:	March 25, 2015
EPA INSPECTOR:	Derrick Samaranski Environmental Engineer

PREPARED BY: Derrick Samaranski — 05/14/2015

Derrick Samaranski
Compliance Section 2

Date Completed

APPROVED BY: — 6/12/15

Julie Morris, Chief
Compliance Section 2

Date

Purpose of Inspection

This inspection was an evaluation of the Materion Advanced Chemicals Inc.'s ("Materion's") compliance with hazardous waste, used oil, and universal waste regulations found at Wisconsin Administrative Code (WAC) and the Code of Federal Regulations (CFR). The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI). The site notified as a large quantity generator of hazardous waste.

Participants

Inspector(s):

Derrick Samaranski, Environmental Engineer, EPA

Site Representatives:

Noreen S, Atkinson, EHS Manager
Mark Curran, Director of Supply Chain

Introduction

On March 25, 2015, I arrived at the location of the Materion facility at 9:51 AM, and proceeded to speak with the facility's receptionist, who informed me that Ms. Atkinson would be arriving to meet with me. When Ms. Atkinson arrived in the reception area, I presented my official credentials, gave Ms. Atkinson my business card, and explained the purpose of my visit. I was asked to watch site's safety orientation video before conducting my inspection of the site.

During the opening conference with Ms. Atkinson, I asked for a description of Materion's operations and a listing of solid and hazardous waste streams generated by the facility. Ms. Atkinson informed me that Materion replaced its environmental coordinator recently and that she is the current facility environmental contact.

I informed Ms. Atkinson that Materion could claim any information gathered during the inspection as Confidential Business information including: verbal information, documents and photographs. Ms. Atkinson did not make a CBI claim on the information gathered during the inspection.

Site Description

The following information about Materion is based on the personal observations of the U.S. EPA inspector and on representations made during the Inspection by the Facility personnel identified above or within the text or otherwise specified.

Materion is a specialty inorganic chemical manufacturer who produces thin film coatings, metal alloys, high purity materials, and thin film deposition materials for the: energy, medical, industrial, aerospace, consumer electronics, automotive and defense industries. The facility manufactures its products from raw materials that include: metal salts, zinc arsenide, metal compounds, aluminum oxides, magnesium fluoride, metals, minerals, hydrofluoric acid, phosphorus, nitrides, and various acids and bases. Production is conducted in induction kettles and furnaces, tube type gas reactors, and specialized equipment (Torrit and Farr units). After fusions and reactions intermediate compounds may be blended or mixed with other materials to form sputtering targets. Finished products are sized (shaped through grinding, sand blasting) in the sizing department to meet customer's specifications. In addition to its own manufacturing Materion may buy and re-sale blended mixtures of similar products. Materion started its operations at the current location in 1964 as Cerac, which was bought by Brush-Wellman.

Manufacturing operations at Materion are housed in two separate buildings Bldg.1 and Bldg. 2. Bldg.2 operations are smaller in size than Bldg. 1 and include magnesium fluoride operations and e-beam melting of metal oxides. Bldg. 1 houses the majority of Materion's manufacturing equipment in production areas that include: sizing, zinc arsenide production, cadmium based products, target manufacturing, gas reactions, machining, and radioactive products. In addition to production Materion also operates quality control and research and development labs throughout its facility.

Support operations at Materion include: maintenance, warehousing, waste water management, waste management and storage, loading and unloading, and electrical.

Manufacturing operations at Materion generate most hazardous waste from the production of zinc arsenide products and include debris, ventilation dust, personal protective equipment, and finishing media. Other hazardous waste streams include heavy metal contaminated solid debris, off-spec materials or products, flammables, and lab wastes. Management of hazardous waste at Materion involves accumulation in satellite containers near the processes generating the waste and storage for 90-days or less prior to off-site disposal to permitted treatment storage and disposal facilities. In addition to bulk waste streams Materion also generates used oil and universal wastes.

Materion used process knowledge, analytical testing, and Material Data Safety Sheets (MSDS) to conduct waste determinations of its waste streams.

Materion started its operations at the current location in 1964 as Cerac, which was bought by Brush-Wellman in 2006 and changed its name to Materion in 2011. The facility employs 97 employees who work three shifts.

Site Tour

Bldg. 2

The site walk-through of the facility started at 1:45 PM, with a visit to the facility's Bldg. 2 which was located across the 13th Street at 1210 S. St. Paul. During our visit to Bldg. 2 we visited: maintenance area, waste water treatment area, MgF_2 manufacturing area, research and development labs, finished product storage, MgF_2 sizing equipment, raw material storage, packaging and equipment storage, e-beam equipment, and scrap material storage.

In maintenance area of Bldg. 2 Materion accumulates flammable liquids in fireproof locker, used gas cylinders, aerosols wastes, and used oil. At the time of our visit, I observed accumulation of hazardous waste in containers that were properly labeled as "Hazardous Waste" and closed. I also observed a 55-gallon container accumulating used oil. The used oil container was properly labeled and was identified as collecting motor oil. Materion representatives identified Bldg. 2 as accumulating hazardous wastes in satellite containers only. The satellite containers are picked-up from Bldg. 2 regularly during waste disposal from 90-day hazardous waste accumulation area in Bldg. 1. No transfer of hazardous waste takes place between the buildings.

In waste water treatment area Materion operates waste water process/storage tanks, packed column scrubber, and neutralization tank to process wastes generated from the production and processing of MgF_2.

After visiting waste water treatment area, we visited MgF_2 production area where Materion operates two reactors, two filter press units, and gas ovens for drying finished products. The filter press units discharge waste water to a 150 –gallon collection sump which feeds into the waste water treatment process tanks and ultimately to a city sewer system under NPDES discharge permit. Used cloth filters generated from the MgF_2 de-watering are disposed as non-hazardous waste. Vapors from the MgF_2 manufacturing are directed to the dedicated stripper column for processing and neutralization.

Next, we visited raw material storage area, scrap product storage area, and MgF_2 sizing area which generates bag house dust from the grinding operation. The bag house dust and scrap MgF_2 is managed as non-hazardous waste and is offered for disposal on a regular basis. Once sized, finished MgF_2 is packed and stored for shipment to customers.

After visiting the MgF_2 sizing area, we briefly visited equipment storage area located in east mezzanine level of Bldg. 2, and e-beam unit which is used to manufacture metal oxides into ingots. Grinding operation of the e-beam ingots generates non-hazardous bag house dust.

Site walk-through of the Bldg. 2 operations ended with a visit to the west mezzanine level where Materion operates two R and D labs. Both labs conduct wet chemistry experiments and generate small quantities of hazardous waste which are accumulated in satellite areas. During our visit to the R and D labs I observed hazardous waste accumulation in 55-gallon drum (heavy metal debris), 15-gallon (heavy metal solids), and flammable liquids in 5-gallon container in a flammable locker. All of the observed satellite containers were properly labeled and closed.

Bldg. 1

Site walk-through of the Bldg. 1 operations started with a visit to the third floor operations where Materion conducts phosphorus metal reactions in tube type furnace reactors. The phosphorus based production is a new addition to the facility's operations that has been added in 2014. In addition to phosphorus based production and sizing, Materion also operates four analytical quality control labs and a Bionomic scrubber unit on the third floor. The scrubber is used to control hydrogen sulfide and hydrogen chloride gas from the gas reactors. Scrubber waste liquids are sent to first floor waste water collection tank, neutralized and discharged under NPEDS permit. Third floor Bldg. 1 operations generate arsenic, heavy metal (D004-D011) and flammable hazardous wastes which are accumulated in satellite containers near the locations generating the wastes. During our visit to the third floor Bldg. 1 operations, I visited several satellite areas including: number 38 which is used for the accumulation of toxic metals and flammables, phosphorus wash solids satellite area outside of phosphorus dry lab, flammable locker near phosphorus based production area, satellite area #39 (chemical pure debris), aerosols waste #40, and satellite areas in the analytical, spectro, and x-ray labs. The flammable locker held small (around 5-gallons) containers of acetone/methanol, isopropyl alcohol/silver, and waste oil hazardous wastes. All of the visited satellite accumulation areas on the third floor were accumulating hazardous wastes in containers that were properly labeled and closed. The site walk-through ended with brief look into the pilot plant. Materion representatives identified no hazardous waste generation in the pilot plant.

After visiting third floor Bldg. 1 operations, we continued the site walk-through by visiting second floor operations which were identified during the opening conference as shipping and receiving, and offices. Materion identified three potential hazardous waste generation areas on the second floor generating contaminated debris type waste streams from shipping and receiving operations. At the time of our visit, no hazardous wastes were being accumulated on the second floor of Bldg. 1.

Next, we visited first floor Bldg.1 operations which are divided into: sizing department, zinc arsenide, target, MgF_2 and cadmium based product manufacturing, prep and staging, finishing, machine shop, and support operations. Support operations consisting of material storage, waste water processing, dust control, maintenance, and electrical.

First, we visited the sizing department (east) where Materion conducts mechanical sizing of finished products to meet customer specks. Waste generated by the sizing department include dust wastes which are controlled by bag house units and wet collector which was installed in 2014. No hazardous waste generation locations were identified during our visit to the sizing department.

From the sizing department we visited sink room (36) which consists of waste water storage collection/neutralization tank, weir tank and paper filtration. Sink room receives and processes waste water generated in Bldg. 1 including scrubber wastes from third and first floor. The processed waste water from sink room is discharged under NPEDS permit. Waste paper filters

are managed as hazardous waste and are collected in a satellite drum near the unit. At the time of our visit the satellite drum accumulating used paper filters was properly labeled and closed.

Next, we visited Materion's 90-day hazardous waste storage area which was located in room 35 and nearby trash compactor unit. At the time of our visit, Materion's hazardous waste storage area held eleven 55-gallon drums, three ten gallon containers and two super sacks of hazardous wastes. The labels on the containers identified the wastes as zinc arsenide debris and solids, used oil filters, oily rags, aerosol waste, and zinc arsenide mop water. All of the observed drums in the 90-day storage area were properly labeled as "Hazardous Waste" or "Used Oil," were closed, and dated with an accumulation start date with the exception of the zinc arsenide mop water drum. The zinc arsenide drum was missing an accumulation start date which was corrected by Ms. Atkinson who dated the drum with 03/25/2015 accumulation start date. The nearby trash compactor unit is dedicated to compressing solid hazardous wastes into 55-gallon drums.

After visiting Materion's 90-day hazardous waste storage area, we continued the site inspection by visiting Electrical Cage and main manufacturing operations. In the Electrical Cage area Materion accumulates used lamps which at the time of the visit were being accumulated in a container that was closed, labeled, and dated with an accumulation start date of 01/28/2015. In the manufacturing and finishing areas we looked at the production equipment, dust control units, and hazardous waste generation locations. First floor manufacturing operations generate dust, contaminated debris, waste oil, waste aerosols, contaminated personal protective equipment, mop water, flammable liquids, and off-spec metals. During our visit to the first floor Bldg. 1 manufacturing area, I inspected satellite areas part of: the zinc arsenide manufacturing (production room, prep room, packaging, and mixing room), target manufacturing (flammable liquids, aerosol waste, contaminated oil, aluminum oxides) and cadmium product manufacturing (machine shop, surface grinding, CNC room). Due to safety concerns several satellite accumulation areas (zinc arsenide) where observed through available windows in the production rooms. All of the observed satellite accumulation areas were closed, properly labeled as "Hazardous Wastes" and near the processes generating the wastes.

The site walk-through ended with a visit to the target manufacturing Torrit waste satellite area 5 located in the west mezzanine level of Bldg. 1 and maintenance. Satellite area 5 held two 55-gallon drums of heavy meatal debris and solvent waste. Both satellite drums were closed and properly labeled as "Hazardous Waste." In the maintenance area Materion collects flammable IPA contaminated solids and toxic solids contaminated with heavy metals in satellite containers. The site walk-through of the facility ended at 4:15 PM.

Records Review

For the records review I requested to see the following: hazardous waste manifest records for off-site shipments for the last three years (2013-2015), hazardous waste and non-hazardous waste stream determinations, weekly inspections logs of the 90-day hazardous waste storage area, Contingency Plan, spill logs, Land Disposal Restriction Forms for hazardous waste streams, used oil and universal waste shipment documents.

First, I reviewed Materion's hazardous and non-hazardous waste profiles of waste streams generated by the facility. My review of the waste profiles included waste profiles from Badger Disposal (WID988580056) and included waste profiles for: zinc arsenide dust (haz), target scraps/ aluminum oxide (haz), oil filters (non-haz), mineral oil (non-haz), electronic scarp (non-haz), lab packs (haz), contaminated RCRA waste water (haz), sizing and ventilation dust (, off-spec chemicals (non-haz), heavy metal debris (haz), toxic solids (haz), sludge filter paper (haz), flammable solvents (haz), reactive sulfide (haz), non-PCB ballast (non-haz), and zinc arsenide filters (haz). Most of Materion's hazardous waste streams are contaminated or contain RCRA metals with hazardous waste numbers of D004-D011. Materion's waste stream profiles are reviewed and renewed every year.

Next, I reviewed Materion's hazardous waste manifests, universal waste shipment documents and used oil shipment documents. No issues of concern were noted from the review of the facility's hazardous waste manifests, which were reviewed back to August of 2013. Along with the hazardous waste manifests I also reviewed a sample of Land Disposal Restriction Forms attached to the hazardous waste manifests. Badger Disposal also receives Materion's universal wastes (used batteries and lamps), electronic scrap, non-PCB ballast, and used oil contaminated solids and filters. Used oil is offered recycling to Safety Kleen Systems Inc. several times a year.

After reviewing manifest and shipment records I reviewed 2013-2015 weekly inspection records of the facility's 90-day hazardous waste storage area and Annual Hazardous Waste Reports Materion submitted to WDNR. No issues were noted from the review of the weekly inspection records and the last two Annual Hazardous Waste Reports (2014 and 2013) which were submitted to WDNR by end February of the following year. Materion reported generating 70,857 pounds of hazardous waste in 2014 and 83,380 pounds in 2013.

The records review ended with review of the facility's Contingency Plan and employee training records. All of Materion's 97 employees are required to take number of safety, environmental, and awareness type training annually. I reviewed a sample of training that was offered to facility employees in March 2014 and I asked Ms. Atkinson for a copy of training record for a Materion employee whose main responsibility is hazardous waste management. I asked that the record include job description and job title of the employee. Review of the Contingency Plan revealed that the facility needs to include description of the emergency arrangements made with the local emergency authorities in the facility's contingency plan.

Closing Conference

For the inspection close-out conference I requested records samples of records which were not readily available at the time of my visit. I gave the facility representative the Small Business Resource Sheet and Wisconsin's Solid and Hazardous Waste Education Center (SHWEC) handout. During the closeout conference I discussed Materion's Contingency Plan, employee training records, and facility spill log. The inspection of the facility ended at 6:45 PM.

Post-Inspection

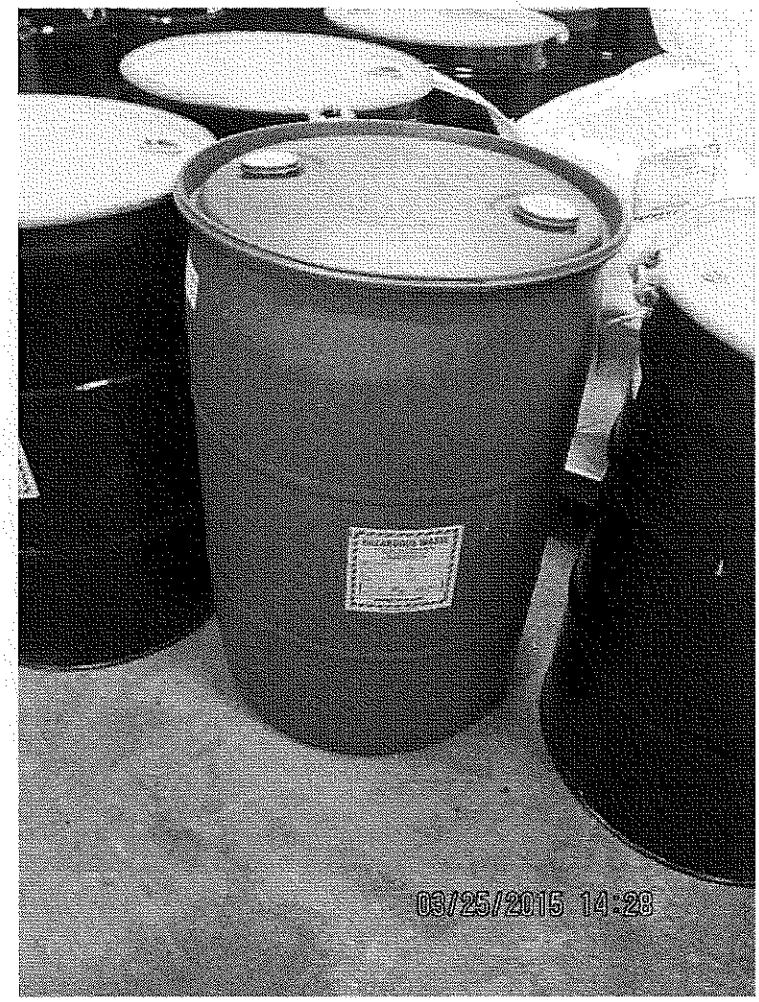
Prior to completion of this inspection report on 04/14/2015, I received an e-mail from Ms. Atkinson regarding the information which I was not able to obtain during the CEI on 03/25/2015. Ms. Atkinson provided me with copies of: Materion's 5 year spill log, example of emergency arrangements made with local Police Dept. and Hospital, and job descriptions and job titles of Materion's employees responsible for transferring hazardous waste containers.

Attachments

A. Photographs
B. Checklist(s)
C. List of Documents Copied/Obtained During Inspection
D. CD of All Photos Taken During the Inspection

ATACHMENT A
Photographs

Materion Advanced Chemicals Inc.
WID006429005



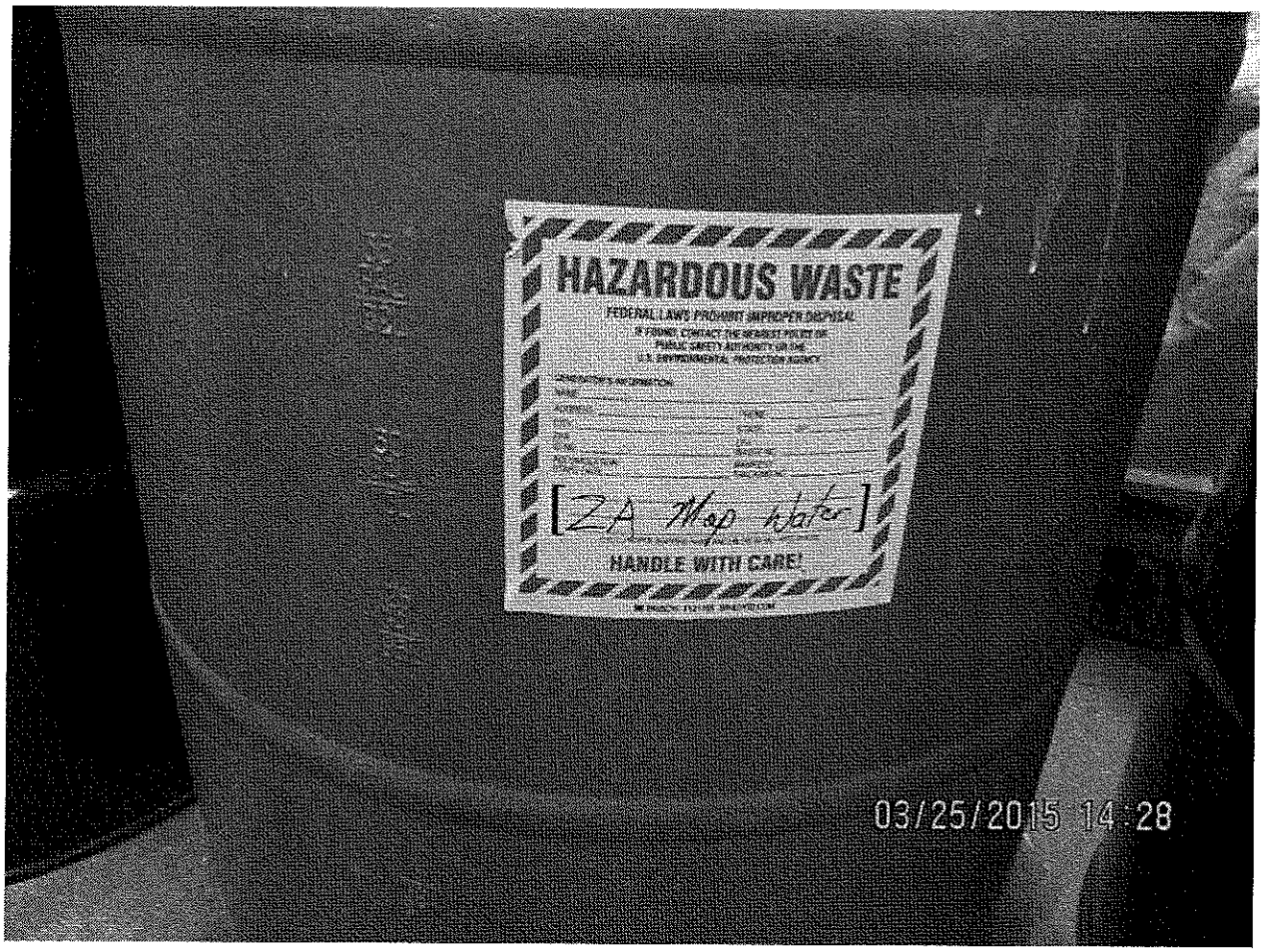
Photograph Number: 1

Photographer: Derrick Samaranski

Date: 03/25/2015

Photograph Description: Hazardous waste container accumulating zinc arsenide mop water in Materion's 90-day storage area missing accumulation start date.

Materion Advanced Chemicals Inc.
WID006429005



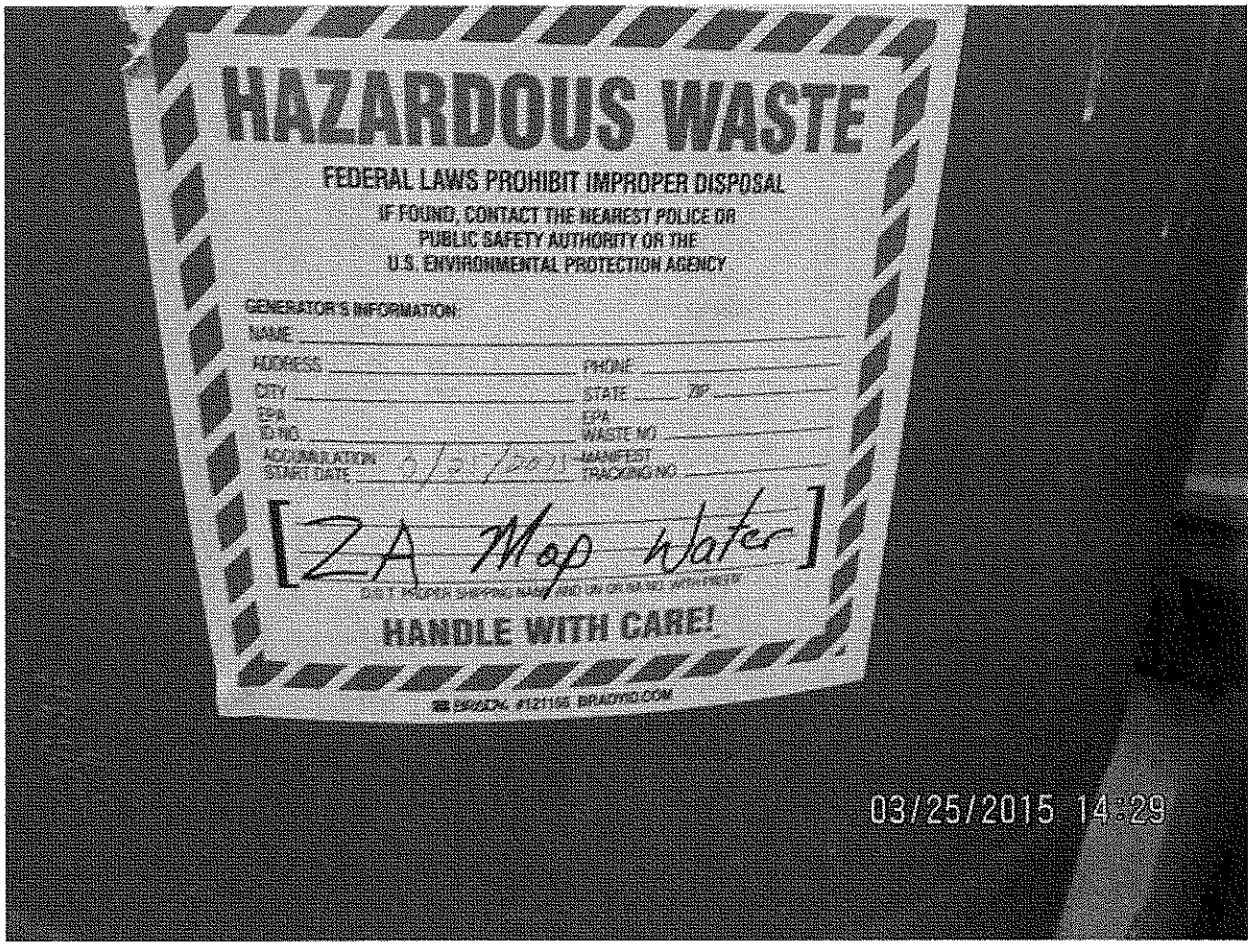
Photograph Number: 2

Photographer: Derrick Samaranski

Date: 03/25/2015

Photograph Description: Close-up view of the label on the hazardous waste drum pictured in photo #1.

Materion Advanced Chemicals Inc.
WID006429005



Photograph Number: 3

Photographer: Derrick Samaranski

Date: 03/25/2015

Photograph Description: Close-up view of the label on the hazardous waste drum pictured in photo #1 with an accumulation start date filled-in.

ATTACHMENT B

ATTACHMENT C
Documents Copied

Document	Date
Copy of the Materion's Site Map (Bdgs. 1 and 2)	03/25/2015
Copy of Materion's Waste Profiles for: contaminated RCRA waste water, sizing and ventilation dust, off-spec chemicals, heavy metal debris, toxic solids, sludge filter paper, flammable solvents, reactive sulfide, non-PCB ballast, and zinc arsenide filters, cadmium powder	03/25/2015
Copy of Materion's Waste Profile and LDR List from Badger Disposal	03/25/2015
Copy of Materion's Contingency Plan Documents	03/25/2015
Copy of 2013 Annual Hazardous Waste Report	03/25/2015
Spill Log 2010-2015	Received as an e-mail attachment on 04/17/2015
Description of Emergency Arrangements with local Police and Hospital	Received as an e-mail attachment on 04/17/2015
Job Description and Job Title for Personnel who transfer HW	Received as an e-mail attachment on 04/17/2015

Section 6: Contingency Plan and Emergency Procedures

B. Generator has amended a SPCC plan or other emergency plan so it sufficiently incorporates hazardous waste management provisions (NR 665.0052(2)).	NA	662.034(1)(d) Photo☐
C. Copies of the contingency plan and all revisions have been made available to police, fire, hospital and emergency response teams. (NR 665.0052(3)).	C	662.034(1)(d) Photo☐
D. Contingency plan was amended due to ANY of the following (NR 665.0054): 1. Contingency plan failed in an emergency. 2. Change in site design, construction, O&M, or other circumstances which affect emergency response. 3. Emergency coordinators changed. 4. Emergency equipment changed.	C	662.034(1)(d) Photo☐
E. Contingency plan identifies an emergency coordinator who meets ALL of the following (NR 665.0055): 1. Available or on call to coordinate emergency response measures. 2. Familiar with all aspects of site activities and the contingency plan. 3. Has authority to commit the resources needed to carry out the contingency plan.	C	662.034(1)(d) Photo☐
F. Contingency plan includes ALL of the following (NR 665.0052): 1. Designation of the primary emergency coordinator, with alternates listed in the order of assuming responsibility. 2. Name, address and phone number, office and home, for each emergency coordinator. 3. Description of the arrangements agreed to by the police, fire, hospitals and emergency response teams to coordinate emergency services. 4. Evacuation plan for personnel including signal(s) to be used in the event of evacuation and alternate routes. 5. Actions facility personnel will take in response to a fire, explosion, or hazardous waste discharge. 6. List of emergency equipment at the site, including location, description and capabilities of each item.	X	662.034(1)(d) Photo☐
G. Contingency plan requires the emergency coordinator to do ALL of the following in the event of a fire, explosion, or discharge of hazardous wastes (NR 665.0056): 1. Activate internal alarms or communication systems. 2. Notify appropriate authorities, if their help is needed. 3. Identify the character, source, amount, and extent of discharged hazardous materials. 4. Assess hazards to human health and the environment. 5. If the incident threatens human health or the environment outside the facility, notify local authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003). 6. Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread. 7. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the site stops operation. 8. Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water, or other material. 9. Ensure wastes that are incompatible with the released material are not treated, stored or disposed until cleanup is completed. 10. Ensure that emergency equipment is clean and fit for use prior to resuming operations. 11. Notify the department and appropriate state and local authorities before resuming operations. 12. Submit an incident report to the department within 15 days.	C	662.034(1)(d) Photo☐

LARGE QUANTITY GENERATOR INSPECTION

Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the calendar year have been submitted to the Department by March 1 of the following year.	C	662.041 Photo☐
B. Transporter or TSD is contacted if signed manifest is not received in 35 days.	NA	662.042(1) Photo☐
C. Exception report is submitted to the Department if a signed manifest is not received within 45 days.	NA	662.042(2) Photo☐
D. Copy of each annual report and exception report is kept for at least 3 years from the date of the report.	C	662.040(2) Photo☐

Section 5: Preparedness and Prevention

A. Generator has ALL of the following, unless the equipment is not necessary for the types of wastes handled (NR 665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	C	662.034(1)(d) Photo☐
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (NR 665.0033).	C	662.034(1)(d) Photo☐
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (NR 665.0034).	C	662.034(1)(d) Photo☐
D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency.	C	662.034(1)(d) Photo☐
E. Aisle space provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	C	662.034(1)(d) Photo☐

Section 6: Contingency Plan and Emergency Procedures

A. Generator has a written contingency plan, amended SPCC plan or other emergency plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge (NR 665.0051). If there is no written plan go to question 7.A.	C	662.034(1)(d) Photo☐

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

K. Hazardous waste is labeled according to applicable DOT requirements before transport.	C	662.031 Photo☐
L. Hazardous waste is marked according to applicable DOT requirements before transport.	C	662.032(1) Photo☐
M. Containers of 119 gallons and less are marked with the "Hazardous Waste-Federal law prohibit improper disposal" label before transport.	C	662.032(2) Photo☐
N. Placards are offered to the initial transporter.	C	662.033 Photo☐

Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	C	668.07(1) Photo☐
B. Generator complies with the prohibition against dilution of wastes.	C	668.03 Photo☐
C. A one-time written notice was sent to each treatment, storage or disposal facility with the initial waste shipment.	C	668.07(1) Photo☐
D. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	C	668.07(1) Photo☐
E. If the waste MEETS treatment standards, the LDR notice certifies wastes may be land disposed without further treatment.	NA	668.07(1) Photo☐
F. If the waste EXCEEDS treatment standards, the LDR notice gives notification of appropriate treatment and applicable prohibitions.	C	668.07(1) Photo☐
G. A copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	C	668.07(1)(h) Photo☐
H. Underlying hazardous constituents have been identified for characteristic wastes.	C	668.09(1) Photo☐
I. Generator identifies EITHER of the following when the waste is both a listed and characterisitic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste codes. 2. The treatment standards for all applicable listed and characteristic waste codes.	C	668.09(2) Photo☐
J. If waste is treated in containers or tanks, the generator meets BOTH of the following (NR 668.07(1)(e): 1. Developed a written waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	NA	662.034(1)(d) Photo☐

LARGE QUANTITY GENERATOR INSPECTION

Revision: 03/19/2012
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate over 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month or over 1 kg of acute hazardous waste in a calendar month, evaluates compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated.	Y	662.011 Photo☐
B. Waste determination was made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used.	Y	662.011(3) Photo☐
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers.	Y	662.011(3)(a)1 Photo☐
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.	Y	662.040(3) Photo☐
E. Generator submitted a notification form and obtained an EPA ID#. Note: A subsequent notification should be submitted when there is an ownership or name change.	Y	662.012 Photo☐

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator initiated a manifest with all off-site shipments of hazardous waste.	Y	662.020(1) Photo☐
B. The manifest is used according to the instructions in the appendix to 40 CFR part 262.	Y	662.020(1) Photo☐
C. The facility designated on the manifest is permitted or licensed to accept the waste.	C	662.020(2) Photo☐
D. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility.	C	662.023(3) Photo☐
E. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262.	C	662.020(1) Photo☐
F. If the generator received a shipment back as a rejected load, the returned waste was accumulated in compliance with the container or tank standards for less than 90 days.	N/A	662.034(13) Photo☐
G. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	NA	662.034(13) Photo☐
H. A copy of the manifest signed by the generator is retained until the signed copy from the designated facility is received.	C	662.040(1) Photo☐
I. Copy of each manifest is kept for at least three years from the date of shipment.	C	662.040(1) Photo☐
J. Hazardous waste is packaged according to applicable DOT requirements before transport.	C	662.030 Photo☐

Section 7: Personnel Training Requirements

A. Generator has a program of classroom instruction or on-the-job training for personnel in hazardous waste management (NR 665.0016(1)(a)). If there is no training program go to question 8.A.	C	662.034(1)(d) Photo☐
B. Program is directed by a person trained in hazardous waste management procedures (NR 665.0016(1)(b)).	C	662.034(1)(d) Photo☐
C. Program teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed (NR 665.0016(1)(b)).	C	662.034(1)(d) Photo☐
D. Training program ensures personnel are able to respond effectively to emergencies by familiarizing them with the following applicable items (NR 665.0016(1)(c)): 1. Contingency plan implementation. 2. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. 3. Key parameters for automatic waste feed cut-off systems. 4. Communications and alarm systems. 5. Response to fires or explosions. 6. Response to groundwater contamination incidents. 7. Shutdown of operations.	C	662.034(1)(d) Photo☐
E. New employees are trained within 6 months of their assignment (NR 665.0016(2)).	C	662.034(1)(d) Photo☐
F. Employees work in supervised positions until they have completed the training (NR 665.0016(2)).	C	662.034(1)(d) Photo☐
G. Personnel take part in an annual review of the training (NR 665.0016(3)).	C	662.034(1)(d) Photo☐
H. Generator keeps ALL of the following training documents (NR 665.0016(4)): 1. Job title and the employee name for each position related to hazardous waste management. 2. Job description for each of the above job titles. 3. Description of the amount and type of introductory and continuing training that will be given to each employee. 4. Records that required training has been given to each employee.	C	662.034(1)(d) Photo☐
I. Training records are maintained until closure for current personnel and at least 3 years from the date the employee last worked at the facility (NR 665.0016(5)).	C	662.034(1)(d) Photo☐

Section 8: 90-Day Container Accumulation

A. Waste is accumulated in containers. If NO, go to Section 9.	C	Photo☐
B. Accumulation start date is clearly marked and visible for inspection on each container.	N	662.034(1)(b) Photo☐
C. All containers are clearly marked with the words "Hazardous Waste".	C	662.034(1)(c) Photo☐

LARGE QUANTITY GENERATOR INSPECTION

Section 8: 90-Day Container Accumulation

D. If container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	C	662.034(1)(a)1 Photo ☐
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	C	662.034(1)(a)1 Photo ☐
F. Containers are kept closed, except when it is necessary to add or remove waste (NR 665.0173(1)).	C	662.034(1)(a)1 Photo ☐
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	C	662.034(1)(a)1 Photo ☐
H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	C	662.034(1)(a)1 Photo ☐
I. Containers of ignitable or reactive waste are located at least 50 feet from the property line (NR 665.0176).	C	662.034(1)(a)1 Photo ☐
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	C	662.034(1)(a)1 Photo ☐
K. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	C	662.034(1)(a)1 Photo ☐
L. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	C	662.034(1)(a)1 Photo ☐

Section 9: Subchapter BB Standards for Equipment Leaks

N/A

A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration >= 10% by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2). 1. Pumps in light liquid service. 2. Compressors. 3. Pressure relief devices in gas or vapor service. 4. Sampling connection systems. 5. Open-ended valves or lines. 6. Valves in gas or vapor service or in light liquid service. 7. Pumps or valves in heavy liquid service 8. Pressure relief devices in light liquid or heavy liquid service. 9. Flanges or other connectors.		Photo ☐
B. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number (NR 665.1050(4), NR 665.1064(7)(e)).		662.034(1)(a) Photo ☐
C. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it operates < 300 hours per calendar year and is identified, either by list or location (area or group), in the facility operating record. (NR 665.1050(5), NR 665.1064(7)(f)).		662.034(1)(a) Photo ☐
D. If the facility determines compliance with subch. BB by documenting compliance with Clean Air Act requirements, the documentation is readily available as part of the operating record (NR 665.1064(13)).		662.034(1)(a) Photo ☐

Section 9: Subchapter BB Standards for Equipment Leaks

E. ALL of the following information used to determine the applicability of exclusions in Questions 9.B. - 9.D. is maintained at the facility (NR 665.1064(11)): 1. Analysis determining the design capacity of the hazardous waste management unit. 2. Statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to subch. BB and an analysis determining whether these hazardous wastes are heavy liquids. 3. Up-to-date analysis and the supporting information used to determine whether or not equipment is subject to subch. BB.		662.034(1)(a) Photo☐
F. When knowledge of the nature of the hazardous waste stream or the process by which it was produced is used to determine the applicability of the exclusions, supporting documentation such as the following are maintained at the facility (NR 665.1064(11)): 1. Information that the production process does not use organic compounds. 2. The process is identical to a process at another facility where the total organic content was measured at <10%. 3. The process has not changed to affect the total organic concentration of the waste.		662.034(1)(a) Photo☐
G. The facility keeps records of new determinations performed when there are any changes that could result in an increase in the total organic content of the waste in contact with equipment that is not subject to subch. BB requirements (NR 665.1064(11)).		662.034(1)(a) Photo☐
H. All equipment stated in Question 9.A. is excluded from additional subch. BB requirements. If NO, complete the subch. BB inspection form.		 Photo☐

Section 10: Subchapter CC Level 1 Container Standards

A. The facility manages hazardous waste in containers with EITHER of the following design capacities. If NO, go to Question 10.R. (NR 665.1087(2)(a), NR 662.034(1)(a)1). 1. Between 26 and 119 gallons. 2. Greater than 119 gallons and not in light material service.	C	 Photo☐
B. Containers are exempt from CC regulation because of ALL of the following (NR 662.034(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)2., NR 665.1084(1)(b)): 1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container. 2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container. 3. The initial determination is reviewed and updated at least once every 12 months. 4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to >= 500 ppmw. 5. The average VO concentration is determined by direct measurement or by knowledge. Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.		 Photo☐
C. For each waste determination, the date, time, and location of each waste sample collected are maintained in the facility records (NR 665.1090(6)(a)).		662.034(1)(a)1 Photo☐
D. Containers are excluded from subch. CC because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 662.034(1)(a)1, NR 665.1080(4)). Note: Certain records are to be maintained. Refer to 665.1090(9) for more information.		 Photo☐
E. Containers are excluded from subch. CC because they are used solely to store or treat EITHER of the following (NR 662.034(1)(a)1, NR 665.1080(2), NR 665.1090(10)): 1. On-site remediation wastes generated through NR 700 or RCRA corrective action activities. 2. Radioactive mixed wastes in accordance with NRC requirements		 Photo☐

Section 10: Subchapter CC Level 1 Container Standards

F. Containers are excluded from subch. CC because BOTH of the following are met (NR 665.1080(2), NR 665.1090.(10)): 1. They are equipped with air emission controls operated in accordance with the Clean Air Act requirements. 2. Facility records include certification of such by the owner or operator and the specific air program compliance requirements for the containers		Photo☐
G. All containers are excluded from subch. CC Level 1 standards. If YES, go to Question 10.R.		Photo☐
H. Any of the following controls are used on all Level 1 containers (NR 665.1087(3)(a)): 1. Container meets applicable US DOT packaging requirements. 2. A cover and closure devices form a continuous barrier over the container openings such that when they are secured, there are no visible holes, gaps or other open spaces into the container. 3. An organic-vapor suppressing barrier is placed on or over the hazardous waste in an open-top container so that the hazardous waste is not exposed to the atmosphere. Note: Level 1 standards do not apply to satellite accumulation or RCRA empty containers.		662.034(1)(a)1 Photo☐
I. If Level 1 containers do not meet applicable US DOT packaging requirements, they are equipped with covers and closure devices composed of suitable materials that minimize exposure of hazardous waste to the atmosphere and maintain integrity of the covers and closure devices (NR 665.1087(3)(b)).		662.034(1)(a)1 Photo☐
J. If a Level 1 container is filled to the final level in one continuous operation, the closure device is promptly secured in the closed position when the filling operation is concluded (NR 665.1087(3)(c)1.a).		662.034(1)(a)1 Photo☐
K. If a Level 1 container is batch filled, the closure device is promptly secured in a closed position when the container is filled to the intended final level OR the batch loading is completed and any of the following first occurs (NR 665.1087(3)(c)1.b): 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.		662.034(1)(a)1 Photo☐
L. If a Level 1 container is opened to remove hazardous waste, the closure device is secured in the closed position upon completion of a batch removal AND when either of the following first occurs (NR 665.1087(3)(c)2b): 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.		662.034(1)(a)1 Photo☐
M. If access to the inside of a Level 1 container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity (NR 665.1087(3)(c)3).		662.034(1)(a)1 Photo☐
N. If a Level 1 container is equipped with a pressure relief device that vents to the atmosphere, ALL of the following conditions are met (NR 665.1087(3)(c)4): 1. The device is designed to operate with no detectable organic emissions (< 500 ppmv) when in the closed position. 2. The device is closed when the internal pressure is within the specified operating range. 3. The device opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.		662.034(1)(a)1 Photo☐
O. Safety valves are only opened to avoid an unsafe condition (NR 665.1087(3)(c)5).		662.034(1)(a)1 Photo☐
P. When a defect is detected, initial repair efforts are made within 24 hours of detection and completed within 5 calendar days (NR 665.1087(3)(d)3).		662.034(1)(a)1 Photo☐

Section 10: Subchapter CC Level 1 Container Standards

Q. If repairs cannot be completed in 5 days of detecting the defect, the waste is removed from the container which is not used until it is repaired (NR 665.1087(3)(d)3).		662.034(1)(a)1 Photo☐

Section 11: Subchapter CC Level 2 Container Standards

N / A

A. The facility manages hazardous waste containers with a design capacity >119 gallons that are in light material service. If NO, go to Section 12.		 Photo☐
B. Any of the following controls are used on Level 2 containers: (NR 665.1087(4)(a)) 1. Container meets applicable US DOT packaging requirements. 2. Each potential leak interface where organic vapor leakage could occur on the container, cover and closure device has been checked to determine that no detectable organic emissions (< 500 ppmv) are occurring. 3. The facility has demonstrated within the last 12 months that the containers are vapor-tight using Method 27 in appendix A of 40 CFR part 60.		662.034(1)(a)2 Photo☐
C. If the potential leak interface on the containers were checked, BOTH of the following were met: (NR 665.1087(4)(a)) 1. Checks were made on the interface of the cover rim and the container wall; the periphery of any opening on the container or container cover and its associated closure device; and, the sealing seat interface on a spring-loaded, pressure-relief valve. 2. The test was performed when the container was filled with a material having a VO concentration representative of the hazardous waste expected to be stored in the container.		662.034(1)(a)2 Photo☐
D. The facility maintains a copy of the procedure used to determine that containers >119 gallons in size that do not meet DOT requirements are not managing hazardous waste in light material service. (NR 665.1087(3)(e))		662.034(1)(a)2 Photo☐
E. Level 2 controls are used when transferring waste in or out of the container that minimize exposure to the atmosphere (submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(4)(b))		662.034(1)(a)2 Photo☐
F. If the container is filled to the final level in one continuous operation, the closure devices are promptly secured in the closed position when the filling operation is concluded. (NR 665.1087(4)(c)1.a.)		662.034(1)(a)2 Photo☐
G. If the container is batch filled, the closure devices are promptly secured in a closed position upon filling the container to the intended final level, or when the batch loading is completed and ANY of the following first occurs: (NR 665.1087(4)(c)1.b.) 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.		662.034(1)(a)2 Photo☐
H. If containers are opened to remove hazardous waste, closure devices are secured in the closed position upon completion of a batch removal and either of the following first occurs: (NR 665.1087(4)(c)2.b.) 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.		662.034(1)(a)2 Photo☐
I. If access to the inside of the container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity. (NR 665.1087(4)(c)3.)		662.034(1)(a)2 Photo☐

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Section 11: Subchapter CC Level 2 Container Standards

NA

J. If the container is equipped with a pressure relief device that vents to the atmosphere, the device meets ALL of the following conditions: (NR 665.1087(4)(c)4.) 1. Designed to operate with no detectable organic emissions when in the closed position. 2. Closed when the internal pressure is within the specified operating range. 3. Opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.		662.034(1)(a)2 Photo ☐
K. Safety valves are only opened to avoid an unsafe condition. (NR 665.1087(4)(c)5.)		662.034(1)(a)2 Photo ☐
L. When a defect is detected, initial repair efforts are made within 24 hours of detection. (NR 665.1087(4)(d)3.)		662.034(1)(a)2 Photo ☐
M. Repairs are completed within 5 days, or the waste is removed from the container which is not used until the defect is repaired. (NR 665.1087(4)(d)3.)		662.034(1)(a)2 Photo ☐

Section 12: Subchapter CC Level 3 Container Standards

NA

A. The facility manages hazardous waste in containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere. If NO, go to Section 13.		 Photo ☐
B. The container is vented directly through a closed-vent system to a control device, or the container is vented inside an enclosure which is exhausted through a closed-vent system to a control device. (NR 665.1087(5)(a))		662.034(1)(a)2 Photo ☐
C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51. (NR 665.1087(5)(b)1.)		662.034(1)(a)2 Photo ☐
D. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 are maintained at the facility. (NR 665.1090(4)(a))		662.034(1)(a)2 Photo ☐
E. Level 3 controls are used when wastes are transferred in or out of the container that minimize exposure to the atmosphere (e.g., submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(5)(f))		662.034(1)(a)2 Photo ☐

Section 13: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 14.	C	 Photo ☐
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	C	662.034(3)(a) Photo ☐
C. Satellite containers are under the control of the operator of the process generating the waste.	C	662.034(3)(a) Photo ☐
D. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	C	662.034(3)(a)1 Photo ☐

Section 13: Satellite Accumulation

E. If a container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	C	662.034(3)(a)1 Photo☐
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	C	662.034(3)(a)1 Photo☐
G. Containers are marked "Hazardous Waste" or with other words that identify the contents.	C	662.034(3)(a)2 Photo☐
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	NI	662.034(3)(b) Photo☐
I. Generator complies with the 90 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	C	662.034(3)(b) Photo☐

Section 14: Waste Minimization

A. Generator includes waste minimization information in the annual report.	C	662.041(3)(e) Photo☐
B. Generator has a program in place to reduce the volume or quantity and toxicity of waste to an economically practicable degree. Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.	C	662.027(1) Photo☐

Section 15: Used Oil

A. Used oil is managed on-site. If NO, go to Section 16	C	 Photo☐
B. Used oil containing >= 1,000 ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.	NA	679.10(2)(a)2 Photo☐
C. Used oil containers and tanks are in good condition and not leaking.	C	679.22(2) Photo☐
D. Used oil containers and tanks are marked "used oil".	C	679.22(3)(a) Photo☐
E. Transporter has an EPA ID number, except when generator self-transports or has a tolling agreement.	C	679.24 Photo☐
F. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1 gallon absorbent results from a non-routine spill.	NA	 Photo☐

Section 15: Used Oil

G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.	NA	679.23 Photo☐
H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.	NA	679.11 Photo☐

Section 16: F006 Wastewater Treatment Sludge

A. Generator accumulates F006 sludge for more than 90 days. If NO, go to Section 17.	NA	 Photo☐
B. The F006 waste is accumulated for no more than 180 days, unless the waste is shipped 200 miles or more.		662.034(7) Photo☐
C. Pollution prevention practices are in place to reduce the amount of contaminants entering the F006 waste.		662.034(7)(a) Photo☐
D. The F006 waste is legitimately recycled through metals recovery.		662.034(7)(b) Photo☐
E. No more than 20,000 kg (44,100 lbs) of F006 waste is accumulated on-site.		662.034(7)(c) Photo☐
F. Accumulation containers meet subch. I, AA, BB and CC standards in ch. NR 665.		662.034(7)(d)1.a Photo☐
G. The accumulation start date is clearly marked and visible for inspection on each container.		662.034(7)(d)3 Photo☐
H. Accumulation tanks meet subch. J, AA, BB and CC standards in ch. NR 665, except for NR 665.0197(3) and NR 665.0200.		662.034(7)(d)1.b Photo☐
I. Each container and tank of F006 waste is clearly marked with the words "Hazardous Waste".		662.034(7)(d)4 Photo☐
J. A containment building used for accumulation meets subch. DD standards in ch. NR 665; a P.E. certification stating compliance with the design standards is in the operating record AND written procedures and documentation for emptying the unit within 180 days are on file.		662.034(7)(d)1.c Photo☐
K. The accumulation of F006 waste is included in the preparedness and prevention procedures, contingency plan and personnel training program.		662.034(7)(d)5 Photo☐
L. If waste is accumulated for up to 270 days, the generator must ship the waste over 200 miles for metals recovery.		662.034(8) Photo☐

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Section 17: Generator Status Evaluation

A. Waste is accumulated for less than 90 days, except as allowed in Sections 13 and 16.	C	662.034(1) Photo☐
B. More than 2,205 lbs. of non-acute hazardous waste; 2.2 lbs. of acute hazardous waste; or, 220 lbs. of residue from cleanup of an acute hazardous waste spill is generated in any month (NR 662.190(1), NR 662.220(4)).	C	 Photo☐
C. Describe other activities that the generator conducts at the facility (accumulation in tanks, recycling, 10-day transfer, transporter, used oil, treatment, storage, disposal, universal waste, etc.).		 Photo☐
D. If waste was previously accumulated in a tank system, the generator performed EITHER of the following (NR 665.0197(1), NR 665.0197(2)): 1. Closure by removing or decontaminating waste residues, contaminated containment system components, soils, structures and equipment. 2. Initiated long-term care if all contaminated soils cannot be practicably removed or decontaminated.	NP	662.034(1)(a)2 Photo☐

UNIVERSAL WASTE HANDLER INSPECTION REPORT - SMALL QUANITY HANDLER

Revision: 03/27/2012
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate or handle less than 5000 kg of universal waste (hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices), evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapters NR 660-679, Wis. Admin. Code). The Universal waste regulations streamline the requirements for hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices. Persons treating, disposing, recycling, or otherwise processing universal wastes are subject to applicable hazardous waste regulations.

Section 1: Prohibitions

A. Universal waste is not disposed on-site.	C	673.11(1) Photo☐
B. Universal waste is not diluted or treated on-site. Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	C	673.11(2) Photo☐

Section 2: General Standards

A. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.	C	673.13 Photo☐
B. Universal waste pesticides and lamps are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	C	673.13 Photo☐
C. Sorting, mixing or handling of batteries is only conducted if the battery casing is not breached and remains intact.	C	673.13(1)(b) Photo☐
D. Wastes generated by handling or cleaning up spills of universal wastes are managed according to hazardous waste or solid waste rules.	C	673.13 Photo☐
E. If mercury containing ampules are removed from thermostats, the handler meets ALL of the following: 1. Ampules are removed in a manner to prevent breakage. 2. Removal is conducted over a containment device. 3. Spills or leaks are immediately cleaned up. 4. Activity is performed in a well ventilated, monitored environment.	NA	673.13(3)(b) Photo☐
F. Pesticides are placed in a tank that meets NR 665 subch. J requirements, except closure and post closure requirements in NR 665.0197(3) and waste analysis requirements in NR 665.0200.	NA	673.13(2) Photo☐
G. Pesticides are placed in a transport vehicle or vessel that is closed, structurally sound, not leaking and compatible with the waste.	NA	673.13(2) Photo☐
H. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	C	673.14 Photo☐
I. Containers, tanks, or transport vehicles of recalled pesticides are additionally marked with the label that was on or accompanied the product when it was sold or distributed.	NA	673.14 Photo☐
J. Length of accumulation time is demonstrated by any of the following: 1. Mark or label each container with the earliest date the waste is generated or received. 2. Mark or label the individual item of waste with the date it was generated or received. 3. Maintain an inventory system identifying the date the waste was generated or received. 4. Place the universal waste in a specific accumulation area identified with the earliest date the waste was generated or received. 5. Use some other method that clearly demonstrates the length of accumulation time.	C	673.15(3) Photo☐
K. Universal waste is accumulated for less than one year from the date generated or received from another handler.	C	673.15(1) Photo☐

Section 2: General Standards

L. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	NA	673.15(2) Photo☐
M. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	C	673.16 Photo☐
N. Handler complies with ALL of the following when a release occurs: 1. Immediately contains the release. 2. Determines if the spill residue is hazardous waste. 3. If hazardous waste, disposes of it as such.	C	673.17 Photo☐

Section 3: Off-site Shipments

A. Handler sends the waste to a destination facility, foreign destination or another handler.	C	673.18(1) Photo☐
B. Handler that self-transports complies with ALL of the following: 1. Applicable US DOT regulations in 49 CFR parts 171 to 180 when transporting universal waste that meets the definition of hazardous materials. 2. Immediately contain release and make waste determination on spill residue. 3. If shipped to a foreign destination other than an OECD country, use an EPA acknowledgement of consent.	NA	673.18(2) Photo☐
C. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	C	673.18(3) Photo☐
D. When shipping to another universal waste handler, the handler has agreed to receive the shipment.	C	673.18(4) Photo☐
E. If a shipment was rejected, EITHER of the following occurred: 1. The waste was sent back to the originating handler. 2. The originating handler agreed on a destination facility to which to ship the waste.	NA	673.18 Photo☐
F. If a shipment contains hazardous waste, the handler receiving the shipment immediately notifies the Department.	NA	673.18(7) Photo☐
G. Nonhazardous, nonuniversal waste, in a universal waste shipment is managed in compliance with the solid waste requirements.	C	673.18(8) Photo☐